

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and the Chapter  
7 Estate of Bernard L. Madoff,

Plaintiff,

v.

Adv. Pro. No. 10-04285 (CGM)

UBS AG, UBS (LUXEMBOURG) SA, UBS FUND  
SERVICES (LUXEMBOURG) SA, UBS THIRD  
PARTY MANAGEMENT COMPANY SA,  
ACCESS INTERNATIONAL ADVISORS LLC,  
ACCESS INTERNATIONAL ADVISORS LTD.,  
ACCESS MANAGEMENT LUXEMBOURG SA  
(f/k/a ACCESS INTERNATIONAL ADVISORS  
(LUXEMBOURG) SA) as represented by its  
Liquidator MAÎTRE FERNAND ENTRINGER,  
ACCESS PARTNERS SA as represented by its  
Liquidator MAÎTRE FERNAND ENTRINGER,  
PATRICK LITTAYE, CLAUDINE MAGON DE  
LA VILLEHUCHET (a/k/a CLAUDINE DE LA  
VILLEHUCHET) in her capacity as Executrix  
under the Will of THIERRY MAGON DE LA  
VILLEHUCHET (a/k/a RENE THIERRY DE LA  
VILLEHUCHET), CLAUDINE MAGON DE LA  
VILLEHUCHET (a/k/a CLAUDINE DE LA  
VILLEHUCHET) individually as the sole  
beneficiary under the Will of THIERRY MAGON

DE LA VILLEHUCHET (a/k/a RENE THIERRY DE LA VILLEHUCHET), PIERRE DELANDMETER, THEODORE DUMBAULD, LUXALPHA SICAV as represented by its Liquidators MAÎTRE ALAIN RUKAVINA and PAUL LAPLUME, MAÎTRE ALAIN RUKAVINA AND PAUL LAPLUME, in their capacities as liquidators and representatives of LUXALPHA SICAV, and GROUPEMENT FINANCIER LTD.,

Defendants.

**STIPULATION AND ORDER**

Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III, and the estate of Bernard L. Madoff, and the defendants in this action UBS AG, UBS (Luxembourg) S.A., UBS Fund Services (Luxembourg) S.A., UBS Third Party Management Company S.A., Access International Advisors LLC, Access International Advisors Ltd., Access Management Luxembourg SA (f/k/a Access International Advisors (Luxembourg) as represented by its Liquidator Maître Fernand Entringer, Access Partners SA as represented by its Liquidator Maître Fernand Entringer, Patrick Littaye, Claudine Magon de la Villehuchet (a/k/a Claudine de la Villehuchet) in her capacity as Executrix under the Will of Thierry Magon de la Villehuchet (a/k/a Rene Thierry de la Villehuchet), Claudine Magon de la Villehuchet (a/k/a Claudine de la Villehuchet) individually as the sole beneficiary under the Will of Thierry Magon de la Villehuchet (a/k/a Rene Thierry de la Villehuchet), Pierre Delandmeter, and Theodore Dumbauld (collectively, the “Moving Defendants,” and together with the Trustee, the “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree as follows:

**WHEREAS**, on January 20, 2022, a scheduling Stipulation and Order was entered by this Court (ECF No. 272);

**WHEREAS**, on February 28, 2022, the Trustee filed a Second Amended Complaint (ECF No. 274);

**WHEREAS**, on April 22, 2022, the Moving Defendants filed four separate Motions to Dismiss the Second Amended Complaint on April 22, 2022 (ECF Nos. 281, 290, 295, 302);

**WHEREAS**, the Trustee is to file any oppositions to the Moving Defendants' motions to dismiss on or before June 17, 2022, and seeks to combine those oppositions;

**WHEREAS**, the Moving Defendants are to file any reply briefs on or before July 29, 2022.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel that:

1. On or before June 17, 2022, the Trustee will file one collective brief in opposition to all four pending motions to dismiss not to exceed 80 pages.
2. This Stipulation may be signed by respective counsel for the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: June 14, 2022  
New York, New York

/s/ Oren J. Warshavsky  
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of Bernard L. Madoff*

*Access Partners SA, Patrick Littaye, Claudine  
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/s/ Marshall R. King

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**SO ORDERED.**

**Dated: June 15, 2022  
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris  
U.S. Bankruptcy Judge**